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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JAN 25 2017

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

JK

UNITED STATES OF AMERICA

BY

DEPUTY

Plaintiff(s)

V.

Criminal Case No. 1-16-CR-00172-001

RYAN DARK WHITE
BOP Inmate No. 59130-037

Defendant

MOTION REQUESTING A JUDICIAL RECOMMENDATION CONCERNING
LENGTH OF RRC/HALFWAY HOUSE PLACEMENT

COMES NOW, the Defendant, ~~Devon~~ White, pro se and unskilled in the field of law, ~~RYAN~~ and respectfully moves this Honorable Court to recommend that the Bureau of Prisons ("BOP") afford the Defendant Residential Re-entry Center ("RRC")/halfway house placement time of 9 months preceding the end of his sentence. In support thereof, Defendant states as follows:

1. On July 28, 2016 Defendant was sentenced by this Court to a term of twenty seven (27) months imprisonment followed by a term of three (3) years of supervised release.
2. Pursuant to the Second Chance Act of 2007 ("SCA") the BOP may place a defendant into RRC/halfway house up to twelve (12) months prior to his release date if it is determined that Mr. White's placement in a halfway house is of *"sufficient duration to provide the greatest likelihood of successful reintegration into the community."*
3. The criteria that the Bureau of Prisons is to consider in assessing an individual applicants' eligibility for up to twelve months of RRC/Halfway House includes: any statement made by the Court concerning the purposes that warranted a sentence to imprisonment and

recommending the type of correctional facility that would be appropriate. 18 U.S.C.

3621(b)(4)(A), (B). (See **Exhibit 1a-Granted RRC 12 month motions**). An

RRC/halfway house is a correctional facility with superior transitional programs to help inmates rebuild their ties to the community.

4. Mr. White is currently housed at the low security Allenwood Federal Correctional Institution in White Deer, Pennsylvania. His release date is September 19, 2017, and a recommendation for RRC placement will not affect this.
5. Mr. White is 48 years old. He is young enough to be reformed and rejoin law-abiding society with all the help of a judicial recommendation for prolonged placement at a federal halfway house.
6. Mr. White's employment history has been anemic, as he has been underemployed most of his adult life, with physical impairments since 2010. Employment prospects are not promising without the retraining assistance at a federal RRC for more sedentary, computer-based positions.
7. In addition, Mr. White has participated in the following BOP programs in an attempt to prepare for his release and aid in his rehabilitation:
 - a. GED;
 - b. Job Skills and Interviews;
 - c. Personal Finance;
 - d. Victim Impact Group.
8. A recommendation that Mr. White be placed for 9 months at an RRC/Halfway House would be non-binding on the BOP, advisory in nature, and consistent with the reintegration principles of the Second Chance Act. This extra RRC time would allow Mr. White to better address the underlying impetus that led to commission of his past and

instant offenses. With a Criminal History Score of 4 and a Criminal History Category of III, Mr. White must be assisted resist the temptation to resume his criminal lifestyle.

9. A recommendation that Mr. White be afforded RRC/Halfway House placement time of 9 months would maintain the integrity of the disposition while still preserving the punitive aspect of his sentence since it would not modify the court's sentence and would allow Mr. White the opportunity to address and correct his elevated risk of recidivism by virtue of his arrest record, the nature of his offenses, his limited job skills, meager employment history, poor vocational opportunities, lack of savings or assets, restitution repayment, homelessness, health problems unaddressed in the BOP, no clothes, no medical insurance, and a prison sentence on his record. He will remain under the control of the BOP while in the supervised environment of the RRC as the law allows.
10. Mr. White expressed exceptional remorse and contrition regarding his commission of his offenses and he cooperated fully with the Prosecution.
11. The Attorney General of the United States and the Inspector General of the BOP have noted in reports and public statements that the BOP is under-utilizing various programs available, such as RRC/halfway house, as it is in Mr. White's case. It should also be noted that generous RRC/halfway house placement reduces the cost of traditional incarceration.
12. If it pleases the court, for all the foregoing reasons, we request the court agree to recommend 9 months of halfway house preceding release for Ryan White.

WHEREFORE NOW, above premises considered, the defendant respectfully requests that this Honorable Court GRANT [his] motion and all relief requested herein, issuing a judicial

recommendation to the BOP that Defendant be granted placement time of 9 months of halfway house, reflecting the same and granting all other relief required by Law, Liberty, and Equity.

Done this 12th Day of December, 2016.

Respectfully Submitted,

x 


Ryan White, Register # 591130-037
FCI Allenwood
PO Box 1000
White Deer, PA 17887

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have served a copy of this pleading upon the Clerk of the Court, VIA US Mail, properly addressed, First-Class Postage prepaid. The accused further requests that a copy of this pleading be forwarded to all parties, VIA the CM/ECF System, as he is indigent, detained, and has no other means.

Done this 12th Day of December, 2016.

Respectfully Submitted,

x 

Ryan White, Register # 59130-037
FCI Allenwood
PO Box 1000
White Deer, PA 17887